

**United States District Court
Northern District of Texas
Fort Worth Division**

STATE OF TEXAS,

Plaintiff,

v.

JOSEPH R. BIDEN, JR., *et al.;*

Defendants.

Case 4:21-cv-00579-P

Texas's Unopposed Motion for Leave to File Out of Time

Texas moves for leave to file its consolidated reply and opposition on October 11, 2021, an extension from its original deadline of October 8, 2021. This motion is sought not for delay, but so justice can be done.

The counsel primarily responsible for drafting and filing Texas's document was unexpectedly struck by debilitating migraine 30 minutes before filing the final documents. The migraine lasted over 48 hours. Having just recently fully recovered, counsel is now prepared to file, which the Defendants do not oppose. In consideration of that courtesy and opposing counsel's schedule, Texas does not oppose the Defendants' reply deadline being set for October 22.

Dated October 11, 2021.

Respectfully submitted,

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Certificate of Conference

I certify that I conferred with Brian Stoltz, counsel for the Defendants, on October 11, 2021, who informed me that the Defendants do not oppose this motion.

/s/ Leif A. Olson

Certificate of Service

I certify that on October 11, 2021, I filed this motion with the Court's CM/ECF system, which will serve it on all counsel of record.

/s/ Leif A. Olson